## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MARK A. FIORINO, Plaintiff,	: : :	Civil Action No. 12-0769
V.	:	
: CITY OF PHILADELPHIA, COMMISSIONER CHARLES H. RAMSEY, SERGEANT KULP (Badge #542), SERGEANT MICHAEL DOUGHERTY (Badge #8830), OFFICER DANIEL B. RUBIN (Badge #3422), OFFICER DANIEL G. SHELLHAMMER (Badge #3029), DETECTIVE THOMAS F. BOYD, JR. (Badge #9039), and UNKNOWN NUMBER OF JOHN AND JANE DOES,		JURY TRIAL DEMANDED
Defendants.	:	

## PLAINTIFF'S NOTICE OF ACCEPTANCE OF DEFENDANTS' RULE 68 OFFER OF JUDGMENT

Pursuant to Rule 68(a) of the Federal Rules of Civil Procedure, Plaintiff Mark Fiorino, through his undersigned counsel, hereby accepts and provides notice that he accepts Defendants' Rule 68 Offer of Judgment, dated February 17, 2012, and postmarked February 21, 2012, attached hereto as Exhibit A, providing for the entry of judgment in favor of Plaintiff and against defendants City of Philadelphia, Commissioner Charles H. Ramsey, Sergeant Kulp, Sergeant Michael Dougherty, Officer Daniel B. Rubin, Officer Daniel G. Shellhammer, Detective Thomas F. Boyd, Jr., and unknown number of John and Jane Does in the amount of twenty-five thousand dollars (\$25,000.00), for all claims for damages, costs, attorneys' fees, and interest accrued.

## AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF PENNSYLVANIA

Dated: March 8, 2012

/s/ Christopher Markos Mary Catherine Roper Attorney ID # 71107 Christopher Markos Attorney ID # 308997 P.O. Box 40008 Philadelphia, PA 19106 Tel.: (215) 592-1513 ext. 116 Fax: (215) 592-1343 Email: mroper@aclupa.org

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Attorneys for plaintiff

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served through the Court's ECF

system upon

Amanda C. Shoffel, Esq. Assistant City Solicitor PA Attorney ID No. 306956 City of Philadelphia Law Dept 1515 Arch Street, 14th Floor Philadelphia, PA 19102 215-683-5443 amanda.shoffel @phila.gov

March 8, 2012

<u>/s/ Christopher Markos</u> Christopher Markos